

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N523933301

FACILITY: MOONLIGHT INDUSTRIES INC	SRN / ID: N5239
LOCATION: 5320 W RIVER DR, COMSTOCK PARK	DISTRICT: Grand Rapids
CITY: COMSTOCK PARK	COUNTY: KENT
CONTACT: Michael Falk , Environmental Coordinator	ACTIVITY DATE: 02/10/2016
STAFF: Denise Plafcan	COMPLIANCE STATUS: Compliance
SUBJECT:	SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:	

**Michael Falk**  
**PPE – Safety Glasses - Closed Toe Shoes**  
**(616) 784-2991**

Denise Plafcan (DP) conducted an unannounced scheduled inspection to determine compliance with state and federal Air Quality rules and regulations, PTI No.906-92 and Opt-out PTI No.168-14.

DP drove around the area prior to entering the facility and also conducted additional surveillance when in the area. There were no odors, fugitive emissions or opacity noted from the facility. DP met with Michael Falk, explained the purpose of the inspection and reviewed the Environmental Inspection brochure. Michael was also the escort on the inspection.

#### **FACILITY DESCRIPTION**

Moonlight Industries paints miscellaneous plastic, fiberglass, metal and wood parts with liquid coatings. The majority of the parts or jobs are plastic parts but they also occasionally paint wood and metal and some of the parts are both metal and plastic. They operate one shift and have ~ 10 employees including office and manufacturing. There are a total of 10 booths, 7 for coating 3 are used for sanding, one infrared oven, and a still.

#### **REGULATORY OVERVIEW**

The facility previously operated under Rule 208(a) but as of March 2015 they became a synthetic minor for HAPs in Opt-out PTI No. 168-14. Records used to demonstrate compliance are attached and cover 2015. Recordkeeping is based on purchasing records as described in the permit application Section 3.1.

Rule 201 exempt equipment includes:

The still used to reclaim MEK exempt under Rule 285 (u)

Sanding booths exempt under Rule 285 (l)(vi)

The facility is not subject to NESHAP coating requirements because potential emissions were too low and now are limited by HAPs Opt-out limits.

They are currently subject to Rule 610 for paint metal furniture parts (they estimate less than 5% of their total coating jobs are for metal furniture).

Rule 632 for volatile organic compounds from existing automobile, truck, and business machine plastic part coating lines. They do not have any order that would fall under this category and therefore, would not be applicable to their operation.

Following a discussion with Heidi Hollenbach and based on memo from Bob Irvine (see previous inspection report), Rule 610 allows for all of the substrates in the rule combined to be up to 100 pounds per day or 2000 pounds per month. Therefore, they are allowed 100 pounds per day for metal coatings, 2000 pounds per month for metal coatings, 2000 pounds per month and 10 tons per calendar year per plastic part coating line and less than 30 tons at the stationary source.

Moonlight Industries uses purchasing records and doing a 12-month rolling average they are able to comply with the 100 pounds per day in the Part 6 rules.

They continue to track MEK as their highest usage HAP even though MEK was delisted as a HAP on December 19, 2005. All other HAPs are well below MEK therefore using this number would be a dramatic worst-case scenario.

**COMPLIANCE EVALUATION**

No testing or sampling was conducted as part of this compliance inspection. Stack dimensions were not verified as part of this compliance inspection and records were readily available, however, they did not cover through December 2015. Michael was informed that the records needed to be maintained and entered in the spreadsheet by the 15<sup>th</sup> of the month. Michael agreed to have the additional records recorded and submitted by February 16, 2016.

**PTI No. 906-92 Special Conditions**

**VOCs** 101.5 pounds per hour - January 2015 highest month at 7.51 pounds of VOC / hour

**VOCs** 29 tons per year - March 2015 highest month at 0.90 tons per 12 month rolling time period

Material limit of 1000 gallons per year of coatings, as applied, for the purpose of coating metal furniture. The company does not track coatings used for metal furniture. Total gallons based on purchasing records for 2015 was 2189.13 gallons. They claim five percent is a high estimate for metal furniture. To exceed the 1000 gallons per year limit they would have to run, at a minimum, thirty percent metal furniture.

Applicant shall not operate the paint spray booths unless all exhaust filters are in place and operating properly. The two booths operating during the inspection all had mat panel filters in place that were operating properly.

**RECORDKEEPING NOTE**

All usage records are based on purchase records not actual usage. Daily usage is based on the purchases for the month divided by the number of coating days. The same is used for the pounds per hour calculations. The monthly usage rate divided by the number of eight hour days they are actually coating.

**PTI No.168-14**

**FLEXIBLE GROUP SUMMARY TABLE**

The following conditions apply Source-Wide to FGFACILITY which includes all process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.

**EMISSION LIMITS**

**Individual HAP** Less than 9.0 tpy - Since they are at 6.3 tons VOC based on purchase records this would also demonstrate compliance with this HAPs limit. Their surrogate HAP of measuring MEK is less than 1.5 tons based on purchase records.

**Aggregate HAPs** Less than 22.5 tpy - Since they are at 6.3 tons VOC based on purchase records this would also demonstrate compliance with this HAPs limit. Their surrogate HAP of measuring MEK is less than 1.5 tons based on purchase records.

**SUMMARY**

Moonlight Industries is considered in compliance with PTI No.906-92, Opt-out PTI No.168-14 and all other AQD State and Federal rules and regulations. Until a feasible method of record keeping can be established, they will continue to use purchase records and will be considered to be in compliance with Part 6 regulations.

NAME Denise Peafco

DATE 2.16.16

SUPERVISOR PMB